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January 21, 2025

Magistrate Judge Valerie Figueredo  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: ***Vinci Brands LLC v. Coach Services, Inc. et al.*** (1:23-cv-05138-LGS-VF)

Dear Judge Figueredo:

Pursuant to the Court's instructions at the December 30, 2024 discovery conference, Plaintiff Vinci Brands LLC ("Vinci") submits the attached declaration in support of its claims of work-product and privilege protection as previously discussed in its letters dated October 25 and December 4, 2024. Per Your Honor's request, Vinci provides via this declaration further factual context that supports Vinci's privilege assertions, under the broad Ohio version of the *Kovel* doctrine, regarding the at-issue communications.

Attached as Exhibit 1 is the declaration of Matthew R. Schuen, Vice President at Candlewood. His declaration explains Candlewood's role and how it helped Benesch provide, and Vinci understand, legal advice. The declaration also attaches the engagement letter between Vinci and Candlewood, along with exemplar communications that show Candlewood's material assistance enabling effective communication between Vinci and its counsel.

An additional declaration is forthcoming from D.A. Davidson. Vinci made every effort to obtain that declaration from D.A. Davidson by today, but the holiday weekend unfortunately prevented Vinci from doing so. Vinci has been informed that it will likely receive the declaration by Thursday. Accordingly, we respectfully request a short extension of time to submit that declaration. Vinci will submit it to the Court immediately when it is received.

We thank Your Honor for your consideration.

Very truly yours,

BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP

s/ Michael A. Vatis

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